

STATE OF TENNESSEE

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December 12, 2000

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VIA HAND DELIVERY

David K. Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *(TRA Docket No:00-00873) TRA Notice of Proposed Rulemaking -
Regulations for Telephone Telecommunications Service Providers*

Dear Mr. Waddell:

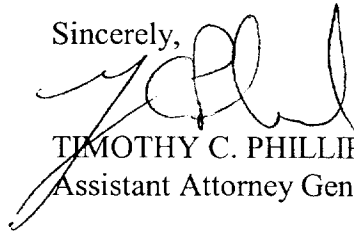
I am in receipt of the industry's letter to you dated 12/1/00. I apologize for not responding sooner, however, I did not receive a copy of the industry's letter until 12/7/00. The TRA staff was kind enough to send me a copy.

The Consumer Advocate and Protection Division of the Attorney General is not opposed to the idea of a workshop. There is however no reason for the delay the industry suggests. The need for implementation of these rules is real. The need is immediate. Moreover, there is no reason to involve the resources of the TRA, its staff and the Consumer Advocate and Protection Division of the Attorney General's Office in molding an industry perspective regarding the proposed rules. If nothing else, the industry has demonstrated solidarity with respect to its approach to the proposed rules. The industry should caucus among themselves and iron any differences. The industry could then present any proposed changes to the TRA staff for consideration.

The TRA might wish to consider amending the timetable to allow the industry to make joint proposals for changes to the rule. The industry could submit these proposals to the TRA by 12/21/00 (certainly no later than 12/28/00). The comments to these proposed changes could be limited to the practical concerns the industry has as related to each specific provision of the rules. Likewise, other interested parties could submit proposed changes with comments limited to the practical concerns addressed by the proposed changes. These comments would be submitted by 12/21/00 (certainly no later than 12/28/00).

A two (2) day workshop on the rules could follow in January 2001. The industry and additional interested parties could then submit additional comments, which would include any legal issues the industry wishes to raise. All comments should be submitted no later than the first week of February, 2001.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Phillips', written over the printed name.

TIMOTHY C. PHILLIPS

Assistant Attorney General